

EXHIBIT A

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,)	Case No. 3:21-cv-01674-MO
)	
Plaintiff,)	PLAINTIFF'S FIRST REQUEST FOR
)	THE PRODUCTION OF DOCUMENTS
v.)	
)	
OMEGLE.COM LLC,)	
)	
Defendant.)	
_____)	

PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS

Pursuant to Rule 24 of the Federal Rules of Civil Procedure, Plaintiff by her counsel,
Barbara C. Long and Carrie A. Goldbeg, hereby requests that Defendant produce the

following items and documents at the office of Vogt & Long PC, 101 SW Main Street, Suite 1900, Portland, Oregon 97204, within 30 days of this Request. This Request is a continuing request and requires production of all items requested which are subsequently acquired by you, up to and including the date of trial.

DEFINITIONS AND INSTRUCTIONS

1. As used in this request, the term “Omegle,” “you,” and “your,” refer to Defendant Omegle.com, LLC.
2. As used in this request, the term the “Omegle” refers to Defendant Omegle.com LLC together with any of its agents, employees, representatives, administrators, investigators, or any other persons who are in possession of or who may have obtained information for Defendant or on Defendant’s behalf.
3. As used in this request, the term “Plaintiff” refers to Plaintiff A.M.
4. “Communication” means any contact between any two or more persons or entities and shall include, but not be limited to, written contacts by such means as letter, memoranda, notes, e-mail, and reports and oral contacts by such means as face-to-face meetings and telephone conversations.
5. As used herein, the term “document” is to be construed in its broadest sense, and refers, without limitation, to all electronic or physical writings, letters, contracts, faxes, handwritten notes, reports, diaries, calendars, drawings, charts, photographs, audio recordings, video tapes, optical discs, tapes, records or printouts, as well as all altered or non-identical copies of each of the foregoing such as those containing any comments or marginal notations, which are within your possession, custody, or control.
6. As used herein, the phrase “relating to” is used in the broadest sense, and means, without limitation: referring to alluding to, responding to, in connection with, commenting on, in response to, about, regarding, announcing, explaining, discussing, showing, describing, constituting, and produced by or from.
7. “Sexual abuse,” “child sexual abuse,” or “child abuse” are intended to cover any form of inappropriate sexual conduct with a minor child, regardless of whether the exact phrase “child sexual abuse” was used. Such conduct includes, but is not limited to “child abuse” as it is defined in ORS 419B.005.
8. In the event Defendant’s counsel is aware – or comes into possession – of material that violates state or federal child pornography laws (CSAM), under no circumstances should

Defendant's counsel send this material to Plaintiff's counsel. If it is material that is responsive to discovery demands, Defendant's counsel must comply with law enforcement and the court to see to it that Plaintiff's lawyers obtain redacted versions of the images, and that the custody of the material, which may constitute evidence in this matter, is in the secure custody of proper law enforcement and available to supervised inspection by experts and counsel during the pendency of this matter. The illegality of CSAM – and the potential for its possession creating an irresolvable attorney-client conflict of interest if divulged – does not dispense with defense counsel's obligations to comply with the rules of evidence.

9. These discovery requests shall be continuing in nature up to and including the time of trial on the merits, for any information or documents herein requested and not known or not in control of the responding party until some time subsequent to the date responses are due or made.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

Please produce the following documents to the extent that they are within your possession, custody or control:

REQUEST FOR PRODUCTION NO. 1. All documents naming, referencing, or depicting Plaintiff or Ryan Scott Fordyce.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2. All documents showing the identity of all employees and independent contractors, paid and unpaid, working for Omegle during the 2014 to 2018 time period.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3. All pitch decks and drafts of pitch decks to potential investors or venture capitalists.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4. All financing and loan applications and agreements for Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5. All applications and draft applications for intellectual property, including trademark and patents.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6. All documents pertaining to intellectual property disputes regarding Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7. All submissions registering Omegle as an LLC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8. All documents and paperwork relating to Omegle becoming available on the Apple Store and Google Play.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9. All documents and paperwork relating to the circumstances surrounding Omegle's removal from the Apple Store and Google Play.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10. Captions for all prior litigations involving Omegle or Leif K-Brooks.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11. Captions for all investigations (including criminal, civil, regulatory) for which Omegle or Leif K-Brooks were involved pertaining to the use or misuse of Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12. All transcripts from any depositions or other sworn testimony given by Leif K-Brooks regarding Omegle or alleged sexual perpetrators on Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13. All documents pertaining to internal policies – past, present, and drafts -- about the reporting of child sexual abuse or child pornography should be reported to law enforcement or the National Center for Missing and Exploited Children.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14. All documents pertaining to the policies, systems, or procedures of content moderation of Omegle during the 2009-2014 time period.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15. All contracts with third parties regarding the content moderation of Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16. Reports, communications, and/or documents prepared by any and all experts who will testify at trial.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17. All documents pertaining to warnings and decision-making about warnings appearing on the Omegle website during the 2009 to 2014 time period.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18. All versions of terms of service appearing on the Omegle website.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19. All ledgers showing Omegle's gross revenues 2009-2014.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20. All ledgers showing entities that advertised on Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21. All reports or "cyber-tips" submitted by Omegle to the National Center for Missing and Exploited Children during the 2009-2014 time period.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22. All documents pertaining to reports of child sexual abuse or child pornography on Omegle during the 2009-2014 time period, with all nudity redacted.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23. All documents, meeting notes, and correspondences related to adding the following warning to the Omegle homepage: "Predators have been known to use Omegle, so please be careful."

RESPONSE:

REQUEST FOR PRODUCTION NO. 24. All documents, meeting notes, and correspondences related to the removal of the following warning from the Omegle homepage: “Predators have been known to use Omegle, so please be careful.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 25. All documents, meeting notes, and correspondences related to the decision to allow children over the age of 13 on Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 26. All documents, meeting notes, and correspondences related to child safety procedures.

RESPONSE:

REQUEST FOR PRODUCTION NO. 27. All documents, meeting notes, and correspondences related to the marketing of Omegle to children.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28. All documents, meeting notes, and correspondences related to selecting third-party advertisements on Omegle.

RESPONSE:

REQUEST FOR PRODUCTION NO. 29. All documents, meeting notes, and correspondences related to user age and/or identity verification.

RESPONSE:

Dated: July 18, 2022

/s/ Barbara Long
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Attorneys for Plaintiff A. M.

CERTIFICATE OF SERVICE

I certify that I served the foregoing **PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS** on the below by the following indicated method or methods:

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Stacia N. Lay
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U.S. MAIL
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X E-MAIL
FACSIMILE
OVERNIGHT DELIVERY

DATED THIS 18th day of July 2022.

VOGT & LONG PC

/s/ Laura McIntyre

Laura McIntyre
Legal Assistant to Vogt & Long PC